

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

SAMANTHA HALL,)	
)	
Plaintiff,)	
)	
v.)	Case No.: CIV-14-0670-HE
)	
CONOCO INC., ET AL.,)	
)	
Defendants.)	

PLAINTIFF'S FINAL LIST OF WITNESSES AND EXHIBITS

COMES NOW the Plaintiff, Samantha Hall, and pursuant to the Court's Revised Scheduling Order [Doc. 64] hereby submits her list of witnesses in chief. Plaintiff reserves the right to add or amend her witness list in chief due to ongoing discovery. Moreover, Plaintiff expects in the near future to move the Court to consolidate her case with the cases of other similarly situated Plaintiffs so that, among other things, duplication will be avoided. As such, it is expected that additional exhibits and witnesses will be added through ongoing discovery.

WITNESSES

NO.	WITNESS	PROPOSED TESTIMONY
1.	Samantha Hall C/O Plaintiff's Counsel	Deposed
2.	Art Hall C/O Plaintiff's Counsel	
	Dr. Nassim Nabbout Cancer Center Treatment of Kansas 3243 E. Murdock, Suite 300 Wichita, KS 67208	Deposed
3.	Dr. David L. Mitchell C/O Plaintiff's Counsel	Expert testimony concerning Plaintiff's exposure to hazardous vapors, including

NO.	WITNESS	PROPOSED TESTIMONY
		BTEX, based upon AERMOD air modeling simulations and all topics in his expert report.
4.	Dr. Martyn Smith C/O Plaintiff's Counsel	Expert testimony concerning the association between benzene exposure and AML, including inversion 16, and on all topics in his expert report.
5.	Dr. Mary Jane Calvey C/O Plaintiff's Counsel	Expert testimony concerning the cause of Plaintiff's AML resulting from her exposure to benzene released by Defendants, and all topics in her expert report.
6.	Dr. Bart Trentham C/O Plaintiff's Counsel	Expert testimony concerning the psychological impacts resulting to Plaintiff as a result of injuries caused to her by Defendants, and all topics in his expert report.
7.	Dr. J. Berton Fisher C/O Plaintiff's Counsel	Expert testimony regarding the nature and extent of groundwater and soil gas pollution caused by Defendants and all topics in his expert report.
8.	Dr. Steven D. Gore C/O Plaintiff's Counsel	Expert testimony concerning the cause of Plaintiff's AML resulting from her exposure to benzene released by Defendants, and all topics in her expert report. NOTE – Motion for Extension filed to permit additional time to prepare this report.
8.	David McIntosh C/O Plaintiff's Counsel	Expert testimony integrating Plaintiffs' exposure to benzene released by Defendants, and all topics in her expert report. NOTE – Motion for Extension filed to permit additional time to prepare this report.
10.	Matthew Tonkin C/O Plaintiff's Counsel	Expert testimony on the levels of benzene vapor intrusion in Plaintiff's childhood homes and all topics in his expert report.
11.	Sara King C/O Defendants' Counsel	To be deposed

NO.	WITNESS	PROPOSED TESTIMONY
12.	Terry Vandell C/O Defendants' Counsel	To be deposed
13.	Representative of the ODEQ C/O General Counsel to the ODEQ	Emissions by the refinery, complaints in the community, responses and statements by Defendants and Defendant's agents concerning their pollution of the Ponca City area; statements by Defendants concerning the regulation and monitoring of benzene and other toxic and hazardous gasses released into the community by the Plaintiff lived, worked and played in.
14.	Tracey Hammon C/O Defendants' Counsel	To be deposed
15.	Representative of the ODOH C/O General Counsel to the ODOD	Emissions by the refinery, complaints in the community, responses and statements by Defendants and Defendant's agents concerning their pollution of the Ponca City area; statements by Defendants concerning the regulation and monitoring of benzene and other toxic and hazardous gasses released into the community by the Plaintiff lived, worked and played in.
16.	Ciera Mathews C/O Plaintiff's Counsel	Her exposure to Defendants' toxic gasses and resulting injuries, cancer, and experiences
17.	Charlie Bryer C/O Plaintiff's Counsel	His exposure to Defendants' toxic gasses and resulting injuries, cancer, and experiences
18.	Representative of Conoco, Inc.	To testify concerning the value and income of the company.
19.	Representative of Phillips 66	To testify concerning the value and income of the company.
20.	Representative of Continental Oil Company	To testify concerning the value and income of the company.
21.	Representative of Conoco, Inc. C/O Defendants' Counsel	Public relations/public statements of the company relating to benzene, other aromatic hydrocarbons and emissions from its refinery
22.	Representative of Phillips 66 C/O Defendants' Counsel	Public relations/public statements of the company relating to benzene, other aromatic hydrocarbons and emissions

NO.	WITNESS	PROPOSED TESTIMONY
		from its refinery
23.	Representative of Continental Oil Company C/O Defendants' Counsel	Public relations/public statements of the company relating to benzene, other aromatic hydrocarbons and emissions from its refinery
24.	John Dimond C/O Defendants' Counsel	Refinery management and emissions of VOC
25.	Charles Downs C/O Defendants' Counsel	Groundwater pollution by COP
26.	Dennis R. Parker C/O Defendants' Counsel	Refinery management and emissions of VO
27.	Terry Lauck C/O Defendants' Counsel	Groundwater pollution by COP
28.	Bill Muldoon C/O Defendants' Counsel	Groundwater and air pollution by COP
29.	Angelus Owili-Eger C/O Defendants' Counsel	Groundwater and air pollution by COP
30.	Craig Stafford C/O Defendants' Counsel	Groundwater and air pollution by COP
31.	Michael W. Page C/O Defendants' Counsel	Groundwater and air pollution by COP
32.	Ron W. Armstrong C/O Defendants' Counsel	Refinery management and emissions of VOC
33.	Pete Stynes C/O Defendants' Counsel	Refinery management and emissions of VOC
34.	Tim Seidel C/O Defendants' Counsel	Refinery management and emissions of VOC
35.	Tom Myers C/O Defendants' Counsel	Refinery management and emissions of VOC
36.	Helen Hatlelid-Hester C/O Defendants' Counsel	COP's representations to the community.
37.	Mindy Hall C/O Plaintiff's Counsel	Deposed
38.	Megan Hall C/O Plaintiff's Counsel	Deposed
39.	Jennifer Jackie C/O Plaintiff's Counsel	The damage the Defendants have done to Ms. Hall.
40.	Rafaellae Espinoza Oklahoma State Department of Health	Data concerning cancer incidence in the areas surrounding the refinery.
41.	Christy Bradley	Data concerning cancer incidence in the

	Oklahoma State Epidemiologist	areas surrounding the refinery.
--	-------------------------------	---------------------------------

EXHIBITS

Ex No.	Title/Description	beg bates	end bates	nativefilename
1	Hall Medical Records	Various	Various	NA
2	Maps of air emissions	Various	Various	NA
3	Maps of groundwater plumes	Various	Various	NA
4	Maps of where Hall lived, played and worked	Various	Various	NA
5	1-Conoco-Hall Defendants Response-1st Discovery-PSN0062	PSXHAL00000398	PSXHAL00000418	NA
6	2015.08.04 Documents Rec'd from DEQ in Response to ORA	CP_ODEQ000001014	CP_ODEQ000001205	CP_ODEQ000001014-000001205.pdf
7	1H2009 Monitoring Work Plan Spring Arsenic Assess 12-5-08	CP_ODEQ000011104	CP_ODEQ000011125	CP_ODEQ000011104-000011125.pdf
8	1H2009 Monitoring Work Plan Spring Arsenic Assess 12-5-08	CP_ODEQ000011126	CP_ODEQ000011148	CP_ODEQ000011126-000011148.pdf
9	1H2009 Monitoring Work Plan Spring Arsenic Assess 12-5-08	CP_ODEQ000011155	CP_ODEQ000011169	CP_ODEQ000011155-000011169.pdf
10	2H2013 Semi Annual RCRA	CP_ODEQ000012237	CP_ODEQ000012303	CP_ODEQ000012237-000012303.pdf

Ex No.	Title/Description	beg bates	end bates	nativefilename
	Groundwater Status Report 03-2014			
11	2010 Private Water Well Inventory Update - December 2010	CP_ODEQ000012697	CP_ODEQ000012712	CP_ODEQ000012697-000012712.pdf
12	2010 Private Water Well Inventory Update - December 2010	CP_ODEQ000012713	CP_ODEQ000012753	CP_ODEQ000012713-000012753.pdf
13	RCRA Spring Monitoring Completion Stat Rpt. No. 13 Aug. 2010	CP_ODEQ000012770	CP_ODEQ000012786	CP_ODEQ000012770-000012786.pdf
14	RCRA Spring Monitoring Completion Stat Rpt. No. 13 Aug. 2010	CP_ODEQ000012796	CP_ODEQ000012820	CP_ODEQ000012796-000012820.pdf
15	RCRA Spring Monitoring Completion Stat Rpt. No. 13 Aug. 2010	CP_ODEQ000012870	CP_ODEQ000012873	CP_ODEQ000012870-000012873.pdf
16	1-Conoco-Hall Defendants Response-1st Discovery-PSN0062	PSXHAL00000123	PSXHAL00000234	NA
17	1-Conoco-Hall Defendants Response-1st Discovery-PSN0062	PSXHAL00000257	PSXHAL00000325	NA
18	1-Conoco-Hall Defendants Response-1st Discovery-	PSXHAL00000618	PSXHAL00000825	NA

Ex No.	Title/Description	beg bates	end bates	nativefilename
	PSN0062			
19	1-Conoco-Hall Defendants Response-1st Discovery- PSN0062	PSXHAL00000826	PSXHAL00000995	NA
20	1-Conoco-Hall Defendants Response-1st Discovery- PSN0062	PSXHAL00001594	PSXHAL00001879	NA
21	1-Conoco-Hall Defendants Response-1st Discovery- PSN0062	PSXHAL00002324	PSXHAL00002471	NA
22	1-Conoco-Hall Defendants Response-1st Discovery- PSN0062	PSXHAL00005004	PSXHAL00005421	NA
23	1-Conoco-Hall Defendants Response-1st Discovery- PSN0062	PSXHAL00005965	PSXHAL00006124	NA
24	1-Conoco-Hall Defendants Response-1st Discovery- PSN0062	PSXHAL00006125	PSXHAL00006286	NA
25	1-Conoco-Hall Defendants Response-1st Discovery- PSN0062	PSXHAL00006287	PSXHAL00006453	NA
26	1-Conoco-Hall Defendants Response-1st Discovery-	PSXHAL00006621	PSXHAL00006781	NA

Ex No.	Title/Description	beg bates	end bates	nativefilename
	PSN0062			
27	1-Conoco-Hall Defendants Response-1st Discovery- PSN0062	PSXHAL00007882	PSXHAL00007964	NA
28	1-Conoco-Hall Defendants Response-1st Discovery- PSN0062	PSXHAL00007885	PSXHAL00008010	PSXHAL00007885.tif
29	1-Conoco-Hall Defendants Response-1st Discovery- PSN0062	PSXHAL00008011	PSXHAL00008957	NA
30	1-Conoco-Hall Defendants Response-1st Discovery- PSN0062	PSXHAL00009217	PSXHAL00009813	PSXHAL00009217.tif
31	1-Conoco-Hall Defendants Response-1st Discovery- PSN0062	PSXHAL00010079	PSXHAL00010090	NA
32	1-Conoco-Hall Defendants Response-1st Discovery- PSN0062	PSXHAL00012379	PSXHAL00012540	PSXHAL00012379.tif
33	1-Conoco-Hall Defendants Response-1st Discovery- PSN0062	PSXHAL00014581	PSXHAL00014634	NA
34	1-Conoco-Hall Defendants Response-1st Discovery-	PSXHAL00015442	PSXHAL00015482	PSXHAL00015442.tif

Ex No.	Title/Description	beg bates	end bates	nativefilename
	PSN0062			
35	1-Conoco-Hall Defendants Response-1st Discovery- PSN0062	PSXHAL00016993	PSXHAL00017048	NA
36	1-Conoco-Hall Defendants Response-1st Discovery- PSN0062	PSXHAL00021225	PSXHAL00021226	PSXHAL00021225.tif
37	1-Conoco-Hall Defendants Response-1st Discovery- PSN0062	PSXHAL00021712	PSXHAL00021806	PSXHAL00021712.tif
38	1-Conoco-Hall Defendants Response-1st Discovery- PSN0062	PSXHAL00022553	PSXHAL00022657	PSXHAL00022553.tif
39	1-Conoco-Hall Defendants Response-1st Discovery- PSN0062	PSXHAL00025308	PSXHAL00025427	PSXHAL00025308.tif
40	2-Phillips 66-Hall Production 02- PSX1	PSXHAL00026353	PSXHAL00026376	NA
41	7-Defendant Phillips 66-Hall Production 05 PSX1	PSXHAL00027574	PSXHAL00027577	NA
42	7-Defendant Phillips 66-Hall Production 05 PSX1	PSXHAL00029828	PSXHAL00029975	NA
43	5-2015.08.28 Documents from DEQ in Response	NA	NA	10-4-10 (2).PDF

Ex No.	Title/Description	beg bates	end bates	nativefilename
	to Subpoena			
44	5-2015.08.28 Documents from DEQ in Response to Subpoena	NA	NA	1996-2002.PDF
45	5-2015.08.28 Documents from DEQ in Response to Subpoena	NA	NA	2003-2004.PDF
46	5-2015.08.28 Documents from DEQ in Response to Subpoena	NA	NA	2005-.PDF
47	Photos	CP_ODEQ000008780	CP_ODEQ000008830	CP_ODEQ000008780-000008780.pdf
48	Analytical Data	CP_ODEQ000008831	CP_ODEQ000009393	CP_ODEQ000008831-000008952.pdf
49	1H2005 Spring Photos	CP_ODEQ000009394	CP_ODEQ000009448	CP_ODEQ000009394-000009394.pdf
50	1H2005 Spring Data	CP_ODEQ000009449	CP_ODEQ000009649	CP_ODEQ000009449-000009649.pdf
51	1H2005 Spring Data	CP_ODEQ000009650	CP_ODEQ000010301	CP_ODEQ000009650-000009848.pdf
52	Springs	CP_ODEQ000009849	CP_ODEQ000010058	CP_ODEQ000009849-000010058.pdf
53	1H2009 Monitoring Work Plan Spring Arsenic Assess 12-5-08	CP_ODEQ000011100	CP_ODEQ000011103	CP_ODEQ000011100-000011103.pdf
54	1H2009 Monitoring Work Plan Spring Arsenic Assess 12-5-08	CP_ODEQ000011149	CP_ODEQ000011154	CP_ODEQ000011149-000011154.pdf
55	1H2009 Monitoring Work Plan Spring Arsenic Assess 12-5-08	CP_ODEQ000011170	CP_ODEQ000011183	CP_ODEQ000011170-000011183.pdf

Ex No.	Title/Description	beg bates	end bates	nativefilename
56	1H2009 Monitoring Work Plan Spring Arsenic Assess 12-5-08	CP_ODEQ000011184	CP_ODEQ000011188	CP_ODEQ000011184- 000011188.pdf
57	2H2008 Semi Annual RCRA Groundwater Rem Stat Rpt. - Feb 2009	CP_ODEQ000011189	CP_ODEQ000011860	CP_ODEQ000011189- 000011194.pdf
58	2H2013 Semi Annual RCRA Groundwater Status Report 03- 2014	CP_ODEQ000011861	CP_ODEQ000012693	CP_ODEQ000011861- 000011867.pdf
59	2010 Private Water Well Inventory Update - December 2010	CP_ODEQ000012694	CP_ODEQ000012696	CP_ODEQ000012694- 000012696.pdf
60	2010 Private Water Well Inventory Update - December 2010	CP_ODEQ000012754	CP_ODEQ000012769	CP_ODEQ000012754- 000012769.pdf
61	RCRA Spring Monitoring Completion Stat Rpt. No. 13 Aug. 2010	CP_ODEQ000012787	CP_ODEQ000012882	CP_ODEQ000012787- 000012788.pdf
62	2H2008 Semi Annual RCRA Groundwater Rem Stat Rpt. - Feb 2009	CP_ODEQ000012875	CP_ODEQ000012875	CP_ODEQ000012875- 000012875.pdf
63	2H2013 Semi Annual RCRA Groundwater Status Report 03- 2014	CP_ODEQ000012883	CP_ODEQ000012889	CP_ODEQ000012883- 000012883.pdf
64	2010 Private Water Well	CP_ODEQ000012888	CP_ODEQ000012888	CP_ODEQ000012888- 000012888.pdf

Ex No.	Title/Description	beg bates	end bates	nativefilename
	Inventory Update - December 2010			
65	RCRA Spring Monitoring Completion Stat Rpt. No. 13 Aug 2010	CP_ODEQ000012890	CP_ODEQ000012890	CP_ODEQ000012890- 000012890.pdf
66	Photos	CP_ODEQ000013284	CP_ODEQ000013335	CP_ODEQ000013284- 000013284.pdf
67	2014.04.22 Documents rec'd in response to ORA to ODEQ- Bates	CP_ODEQ000006057	CP_ODEQ000006987	CP_ODEQ000006057- 000006987.pdf
68	2014.04.22 Documents rec'd in response to ORA to ODEQ- Bates	CP_ODEQ000006988	CP_ODEQ000007890	CP_ODEQ000006988- 000007890.pdf
69	2014.04.22 Documents rec'd in response to ORA to ODEQ- Bates	CP_ODEQ000007891	CP_ODEQ000008779	CP_ODEQ000007891- 000008779.pdf
70	Documents relied upon by experts in their expert reports.	NA	NA	NA
71	Documents from DEQ	NA	NA	00001.PDF
72	Documents from DEQ	NA	NA	00117.PDF
73	Documents from DEQ	NA	NA	00160.PDF
74	Groundwater maps and data	NA	NA	3613491.pdf
75	Groundwater maps and data	NA	NA	3617374.pdf
76	Groundwater maps and data	NA	NA	Image-2975784.pdf

Ex No.	Title/Description	beg bates	end bates	nativefilename
77	Groundwater maps and data	NA	NA	Image-2975786.pdf
78	Groundwater maps and data	NA	NA	Image-2986635.pdf
79	Groundwater maps and data	NA	NA	Image-2986636.pdf
80	Groundwater maps and data	NA	NA	Image-2986637.pdf
81	Groundwater maps and data	NA	NA	Image-3079355.pdf
82	Groundwater maps and data	NA	NA	Image-3148142-1.pdf
83	Groundwater maps and data	NA	NA	Image-3148244.pdf
84	Groundwater maps and data	NA	NA	Image-3513382.pdf
85	Groundwater maps and data	NA	NA	Image-500178721.pdf
86	2H2008 Semi Annual RCRA Groundwater Rem Stat Rpt. - Feb 2009	CP_ODEQ000011220	CP_ODEQ000011240	CP_ODEQ000011220-000011340.pdf
87	RCRA Spring Monitoring Completion Stat Rpt. No. 13 Aug. 2010	CP_ODEQ000012821	CP_ODEQ000012842	CP_ODEQ000012821-000012842.pdf
88	1-Conoco-Hall Defendants Response-1st Discovery-PSN0062	PSXHAL00009122	PSXHAL00009130	NA
89	1-Conoco-Hall Defendants Response-1st Discovery-PSN0062	PSXHAL00010442	PSXHAL00010522	NA
90	1-Conoco-Hall Defendants	PSXHAL00013748	PSXHAL00013828	NA

Ex No.	Title/Description	beg bates	end bates	nativefilename
	Response-1st Discovery- PSN0062			
91	1-Conoco-Hall Defendants Response-1st Discovery- PSN0062	PSXHAL00013854	PSXHAL00013904	NA
92	1-Conoco-Hall Defendants Response-1st Discovery- PSN0062	PSXHAL00015414	PSXHAL00015431	NA
93	1-Conoco-Hall Defendants Response-1st Discovery- PSN0062	PSXHAL00016119	PSXHAL00016227	NA
94	Q10 of Conoco, Inc.	NA	NA	NA
95	Q10 of Phillips 66	NA	NA	NA
96	Financial documents showing value and income of the Continental Oil Company	NA	NA	NA
97	Complaints in the community resulting from Defendant's emission of toxic, hazardous and noxious gasses	Various	Various	NA
98	All those documents which Plaintiff determines tend to prove her	NA	NA	NA

Ex No.	Title/Description	beg bates	end bates	nativefilename
	claim or which she learns about or obtains in continuing discovery			
99	All those documents listed by Defendants not objected to by Plaintiff	NA	NA	NA

Respectfully submitted,



Jason B. Aamodt, OBA #16974
Deanna Hartley, OBA #19272
Krystina E. Phillips, OBA #30111
Dallas L.D. Strimple, OBA #30266
INDIAN AND ENVIRONMENTAL LAW
GROUP, PLLC
1723 E. 15th Street, Suite 100
Tulsa, Oklahoma 74104
Telephone: (918) 347-6169
Facsimile: (918) 398-0514
Email: jason@iaelaw.com
deanna@iaelaw.com
krystina@iaelaw.com
dallas@iaelaw.com

and

G. Steven Stidham, OBA #8633
LEVINSON, SMITH & HUFFMAN, P.C.
1743 EAST 71ST STREET
TULSA, OKLAHOMA 74136-5108
918.492.4433 - TEL.
918.492.6224 - FAX
Email: gstidham@lsh-law-firm.com

and

Kalyn C. Free, OBA #12298
KALYN C. FREE, PC
2248 E 48th Street
Tulsa, Oklahoma 74105
Telephone: (918) 916-0716
Email: Kalyn@kalynfree.com

and

Trae Gray, OBA #21196
LANDOWNERFIRM, PLLC
Rt. 5, Box 305
Coalgate, Oklahoma 74538
Telephone: (580) 927-2314
Facsimile: (580) 927-2315
Email: tg@landownerfirm.com

Attorneys for Plaintiff Samantha Hall

CERTIFICATE OF SERVICE

I hereby certify that on the Tuesday, March 1, 2016, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Lloyd W. Landreth - *llandreth@gablelaw.com*
Scott R. Rowland - *srowland@gablelaw.com*
Robert J. Carlson - *rcarlson@gablelaw.com*
GABLE & GOTWALS

Robert H. Alexander, Jr. - *alexattys@productlaw.com*
THE LAW OFFICES OF ROBERT H. ALEXANDER, JR., PC

Brett J. Young – *brett.young@klgates.com*
K&L GATES LLP

Attorneys for Defendants

A handwritten signature in black ink, consisting of a stylized 'J' followed by a long horizontal stroke.

Jason Aamodt